

**1:20-CV-07675**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISIONRICHARD P. MORROW

\_\_\_\_\_

Plaintiff(s),

vs.

OAK LAWN POLICEDEPARTMENT ET AL.

Defendant(s).

**RECEIVED**

AJS

12/22/2020

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Case No.

**COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS**

*This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.*

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is RICHARD P MORROW.

*If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.*

4. Defendant, OAK LAWN POLICE DEPARTMENT, is  
(name, badge number if known)

☐ an officer or official employed by SANDRA BURY, RANDY PALMER;  
(department or agency of government)

MICHAEL MURRAY, SCOTT O'NEILL, DANIEL VITTORE

☐ an individual not employed by a governmental entity.

***If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.***

5. The municipality, township or county under whose authority defendant officer or official acted is OAK LAWN ILLINOIS. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 12/18/19, at approximately 1:45 ☐ a.m. ☒ p.m.  
(month, day, year)  
plaintiff was present in the municipality (or unincorporated area) of \_\_\_\_\_  
\_\_\_\_\_, in the County of COOK,  
State of Illinois, at \_\_\_\_\_,  
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (***Place X in each box that applies***):

- ☒ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other:

BANISHED PLAINTIFF FROM PROPERTY OF OAK LAWN PARK DISTRICT  
WITH NO LEGAL PAPERWORK

*DESPITE PLAINTIFF VETTED BY FBI, HOMELAND SECURITY, FEDERAL BACKGROUND CHECK WORKS AT FEDERAL AIRPORT*

7. Defendant officer or official acted pursuant to a custom or policy of defendant

municipality, county or township, which custom or policy is the following: **(Leave blank if no custom or policy is alleged):** \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

8. Plaintiff was charged with one or more crimes, specifically:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

9. **(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")** The criminal proceedings

☐ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>

☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows \_\_\_\_\_

\_\_\_\_\_.

☐ Other: \_\_\_\_\_.

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<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.



10. Plaintiff further alleges as follows: (Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)

FALSE POLICE REPORTS FILED BY OAK LAWN  
POLICE DEPARTMENT AND VILLAGE OF OAK LAWN. VILLAGE  
AND POLICE DEPT AIDED AND DISTRIBUTED PHOTO OF  
PLAINTIFF SAYING DIAL 911. WHEN DIALED SENDING 7  
SQUAD CARS AND OFFICERS. Village and Park District  
HAD POLICE DEPT VERBALLY ASSAULT PLAINTIFF 1 INCH  
FROM HIS FACE IN HOPES OF PHYSICALLY DETAINING HIM.  
SCOTT O'NEILL'S ACTIONS WERE ON 9/25/16 at  
10:00 A.M. AT ICE ARENA. PLAINTIFF FILED  
REPORT WITH OAK LAWN P.D. ON 9/24/16  
AT 9:53 AM. PLAINTIFF NOTIFIED OF BANISHMENT  
12/18/19

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

NOT ALLOWED TO PLAY GOLF AT COURSE PLAINTIFF PAYS TAXES  
ON. FEAR OF POLICE DETAINING PLAINTIFF AND  
STOPPING VEHICLE, EMOTIONAL DISTRESS, HARASSMENT, DEFAMATION  
OF CHARACTER, SLANDER, UNLAWFUL REPORTS, RETALIATION

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

**WHEREFORE**, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☐ (*Place X in box if you are seeking punitive damages.*) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: \_\_\_\_\_

Plaintiff's name (*print clearly or type*):

Plaintiff's mailing address: \_\_\_\_\_

City CHICAGO RIDGE State IL ZIP 60415

Plaintiff's telephone number: (773) 259 - 9689.

Plaintiff's email address (*if you prefer to be contacted by email*): \_\_\_\_\_

15. Plaintiff has previously filed a case in this district. ☒ Yes ☐ No

*If yes, please list the cases below.* 1:17-cv-07496

***Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.***